

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

BOBBY MORRIS, individually and on
behalf of all others similarly situated,

Plaintiff,
v.

ACME ELECTRIC MOTOR, INC. D/B/A
ACME TOOLS

Case No.

4:25-CV-00020

JURY TRIAL DEMANDED

District Judge Matthew T. Schelp

Defendant.

**MOTION TO EXTEND TIME TO RESPOND FOR
INTERROGATORIES, DOCUMENT REQUESTS, AND REQUESTS FOR ADMISSION**

The Plaintiff, Bobby Morris, respectfully requests that he receive an extension of time to August 6, 2025, to respond to Defendant's discovery including Interrogatories, Document Requests, and Requests for Admission ("Discovery Requests"), respectfully averring as follows:

1. Plaintiff was served with the instant Discovery Requests on June 16, 2025.
2. Defendant provided a brief extension to July 23, 2025 within which to respond.

Currently, the subject requests are due, by agreement of the parties, on July 23.

3. Defendant itself has not responded to the Plaintiff's own requests, which were served on June 9, but which Defendant objected to because, despite the body and everything else in the requests being correct and applicable to the Defendant and the discovery the Plaintiff sought to have served, the caption on the discovery was incorrect, and Defendant insisted that the Plaintiff re-serve discovery on July 11, 2025.

4. The instant discovery requests are tremendously overbroad, disproportionate to the limited discovery that the Court has ordered, and necessitate numerous objections, including,

among other things, seeking the production for “inspection and forensic investigation all computers, tablets, smartphones, cellular phones, and/or electronic communication devices in Your possession, custody or control from November 1, 2022 to the present.”

5. As such, formulating appropriate objections, supported by applicable case law, has and is taking Plaintiff’s counsel much longer than anticipated, particularly given the press of other business and matters.

6. As such, Counsel for the Plaintiff requires additional time to confer with the client and to analyze and formulate its objections and responses.

7. No prejudice will result from the extension of time sought herein, and no rights of Defendant will be diminished as a result of this brief extension.

8. Plaintiff’s counsel conferred with Defendant’s counsel, and Defendant’s counsel Does not consent to the requested extension.

WHEREFORE, Plaintiff respectfully requests that this Court enter the attached proposed Order granting Plaintiff’s motion for an extension of time and providing Plaintiff an extension of time until August 6, 2025 to respond to Defendant’s discovery including Interrogatories, Document Requests, and Requests for Admission.

RESPECTFULLY SUBMITTED AND DATED this July 22, 2025.

/s/ Andrew Roman Perrong
Andrew Roman Perrong, Esq.
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Attorney for Plaintiff and the Proposed Class

CERTIFICATE OF SERVICE

I, Andrew Roman Perrong, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this date.

DATED this July 22, 2025.

/s/ Andrew Roman Perrong
Andrew Roman Perrong, Esq.

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**[PROPOSED ORDER GRANTING]
MOTION TO EXTEND TIME TO RESPOND FOR
INTERROGATORIES, DOCUMENT REQUESTS, AND REQUESTS FOR ADMISSION**

AND NOW, this _____ day of _____, 202____, upon consideration
of the Plaintiff's Motion for Extension of Time, it is ORDERED that the motion is GRANTED.
Plaintiff shall have until August 6, 2025 in order to respond to the Defendant's discovery.

District Judge Matthew T. Schelp